



December 9, 2016

Judge Rayne Pearson  
 Administrative Law Judge  
 WUTC  
 1300 Evergreen Park Dr. SW  
 Olympia, WA 98052

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 STATE OF WASH.  
 UTIL. AND TRANSP.  
 COMMISSION

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Re: TC-143691 & TC-160516; *Shuttle Express, Inc. v. Speedishuttle Washington, LLC*  
 Update on Data Requests 2/12 Follow up Documents

Dear Judge Pearson:

We write to update the Commission as required during the discovery conference on December 2, 2016. Speedishuttle has begun to run various searches and is working to find a way to balance locating responsive documents against the additional and unreasonable burden of reviewing huge amounts of non-responsive, privileged or proprietary information which is being identified in the course of the search. Speedishuttle is working to collect a representative production that demonstrates how different customers come to use Speedishuttle as an airporter service, and how Speedishuttle holds out to perform in Washington with regard to obtaining new customers.

Based on the current efforts and how they have progressed this week, Speedishuttle hopes to make a production of representative documents it has located by the close of business Friday, December 16, 2016. Considering the difficulties it has experienced in the searches it has run to date, we anticipate a thorough search could take as much as 60 days and hundreds of personnel hours. However, based upon the burdens and associated costs apparent from Speedishuttle's efforts to date, as well as the proprietary nature of Speedishuttle's communications in an airporter industry which the Commission has described as extremely competitive since 2013, we also hope to explore other means by which the search and document production can be limited.

Yours truly,

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2016, I caused to be served the foregoing document to the following address via email and or US mail:

Julian Beattie Office of the Attorney General Utilities and Transportation Division 1400 S. Evergreen Park Dr: SW PO Box 40128 Olympia, WA 98504-0128 (360) 664-1192 Email: <a href="mailto:jbeattie@utc.wa.gov">jbeattie@utc.wa.gov</a>	Brooks Harlow Lukas, Nace, Gutierrez & Sachs, LLP 8300 Greensboro Dr. Suite 1200 McLean, VA 22102 (703) 584-8680 Email: <a href="mailto:bharlow@fcclaw.com">bharlow@fcclaw.com</a>
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Dated at Seattle, Washington this 9<sup>th</sup> day of December, 2016.

  
Maggi Gruber  
Legal Assistant